

April 23, 2008

The Secretary
Federal Communications Commission
445 12th Street SW
Washington, DE

MB Docket No. 04-233
Comments in Response to Localism

I am compelled to render my feelings on the recent proposal regarding the Notice of Proposed Rule Making with regard to localism. This proposal is designed to re-regulate broadcast stations. As a broadcaster and manager with over 30 years of experience in local media it is very apparent that this rule would bring increased costs to the broadcast with no benefit to the listeners.

It has been proven time and time again that radio stations who are not effectively serving the communities in which they do business with ratings and revenue. Our market is served by Arbitron twice per year providing us with a gauge on what the community is looking for with regard to programming and entertainment content of our stations. We continue to provide this content as shown in these ratings. Stations that are not successful and/or not 'in tune' with their communities quickly wane with the absence of listeners and revenue.

Should this proposal be handed down to local broadcasters the potential outcome would be the exact opposite of desired end result. We as local broadcasters currently do provide what is in the best interest of our community while the plan is designed to shift these appraisals of what is best locally to individuals in Washington DC who do not have a pulse on the individual communities, let alone the ability to correctly pronounce Duluth.

Furthermore, the addition of creating community advisory boards, listener surveys, focus sessions, town hall meetings, quantitative standards for programming, enhanced disclosure obligations, etc., would be debilitating to small broadcasters financially as well as programmatically. Under current regulations it is a full time job to document the current community service for the FCC for this cluster.

It is apparent that these proposals have been introduced by antagonists who would like to repeal the course of deregulations and who claim that local stations are out of touch with our communities and no longer staff the stations with live bodies. In our market this